IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN

GRG VENTURES, LLC d/b/a Game Room Guys, a Michigan limited liability company,

> Plaintiff, Case No. 18-755

> > Hon. Janet T. Neff v.

DBEC, LLC, a Wisconsin limited liability company,

Oral Argument Requested

Defendant.

Nicholas S. Laue (P79260) Keller & Almassian, PLC Attorneys for Plaintiff 230 E. Fulton Street Grand Rapids, Michigan 49503 (734) 747-7055 thb@blaske.com it4@blaske.com

John Di Giacomo (P73056) Attorney for Defendant Revision Legal, PLLC 444 Cass St. Suite D Traverse City, MI 49684 (231) 714.0100 john@revisionlegal.com

Eric Misterovich (P73422) Attorney for Defendant Revision Legal, PLLC 8051 Moorsbridge Road Portage, MI 49024 (269) 281.3908 eric@revisionlegal.com

Exhibit "2"

Dated: December 13, 2018 By: /s/ John Di Giacomo

John Di Giacomo (P73056)

Catalog Inventory Pricing Orders Advertising Storefront Reports Performance Appstore B2B

Case ID 5337027071

Answered Case

Answered cases cannot be reopened after 5 days with no activity. If you need help with an issue, please contact us.

Amazon

Your case has been forwarded to another Amazon team and they will contact you regarding your question.

---Original Message---

The seller Game Room Guys is violating Amazon's rules and Trademark rules and the law.

Game Room Guys is bullying other seller by block them from selling the same products on a page they have created.

What Game Room Guys is doing is making listings with other manufactures products and then putting their name on it as the manufacture.

This is not true, Game Room Guys are not the manufacture.

Game Room Guys is putting the item in a clear bag with their name card stapled to it then telling other sellers they can't sell that same product due to their

trademark name. Their trademark name has nothing to do with the product being sold.

Their name should not be in the title or product name and their name card should not be in the picture with the product

Here is a sample

This product is manufactured by Championship out of Chicago Illinois https://www.champbilliards.com/accessories/foosball/

Game Room Guys puts it in a clear bag with their name card on it and list it on your website but then tells every other seller they can't sell on that same page

because their name is trademark. Game Room Guys does this to block any competition with that same product.

[https://images-na.ssl-images-amazon.com/images/I/41WHC42chQL.jpg]

This product is manufactured by Tweeten Fibre Company out of Chicago Illinois. http://www.tweeten.us/

http://www.tweeten.us/>;

Game Room Guys stick their sticker on it and block any other seller from selling the same product, when they see your selling

on their page Game Room Guys sends you law suit action saying your violating their trademark and you will be sued.

[https://images-na.ssl-images-amazon.com/images/I/51UX0MAsz3L_SL1000_.jpg]

Here is a link to Game Room Guys store

https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=&isCBA=&marketplaceID=ATVPDKIKXODER&orderID=&seller=A2J57LGVUCEP4A&tab=&vasStoreID=

Here is a link to every product they are breaking the rules with this bogus story of trademark protection.

View Your Case Log

Sep 03, 2018 11:07 PM

Q Messages Help Settings

All of the listings in the above link needs to be removed from Amazon as it unfair business practices.

Game Room Guys should not be able to control a product page with their name, their name should not be in those listings as a the manufacture or the product title.

David W. Bates
DB Entertainment Company
Soda Bar System
3700 East Elm Road
Oak Creek, Wisconsin 53154-6618
Phone: 414-255-4432

Email: david@dbec.us<mailto:david@dbec.us>

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[1509468551755_Page_Game_Room.jpg] Below are websites owned by DBEC LLC

Please take a moment to view them all.

Main Site:

http://www.dbec.us<http://www.dbec.us/>

DBEC LLC

Billiard And Game Room:

http://www.dbentertainmentco.com<http://www.dbentertainmentco.com/>

DB Entertainment Company

Beverage Dispensers:

Fax: 414-762-2934

http://www.sodabarsystem.com<http://www.sodabarsystem.com/>

Soda Bar System

Residential Beverage Dispensers:

http://www.sodabarsystems.com<http://www.sodabarsystems.com/>

Soda Bar Systems

[https://outlook.office.com/owa/service.svc

/s/GetFileAttachment?id=AQMkADM4NjRlYjkxLTMzAGY0LTQyMTktOTNjNC0wODUwOTgxZjJmYjUARgAAA01VU4VjK09LkZyrVPhukeEHABFA3kpGk3JCuz6L7ElGEgsAAAlBYAAAABFA3kpGk3JCuz6L7ElGEgsAAAlgwQAAAAESABAAMP4df2OfL0qeBhQElNVH3Q%3D%3D&X-OWA-CANARY=w9jYsjnw50Kp-Yu0Qo5mjCCiSy8q1dQYVHXV9-qiaDajM38uUzfz9Thxne6dM0E597OnTJBQOtU.&isImagePreview=True]https://www.facebook.com/SodaBarSystem

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https://www.facebook.com/DJTrucking2500;

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Orders Advertising Storefront Reports Performance Appstore Catalog Inventory Pricing

Re: Your Amazon.com Seller Account

Case ID 5146531571

Answered Case View Your Case Log

Answered cases cannot be reopened after 5 days with no activity. If you need help with an issue, please contact us.

Amazon

Jun 19, 2018 08:38 AM

Greetings from Amazon Seller Support,

It was a pleasure talking to you over the phone.

As discussed, the ASIN: B00D37O6T8 has been re-instated by the seller-performance team.

The documents submitted by you are accepted by our team and the ASIN has been re-instated.

As promised, I have listed the ASIN in your inventory. You can verify the same using this link:

https://sellercentral.amazon.com/hz/inventory?_encoding=UTF8&asin=B00D37O6T8&ref=xx_invmgr_shel_xx&tbla_myitable=sort:%7B%22sortOrder%22%3A%22DESCENDING%22%2C%22sortedColumnid%22%3A%22date%22%7D; search:B00D37O6T8;pagination:1;

The ASIN is currently out of stock, as the quantity is 0. I assure you that once you update the price and quantity, the ASIN will be active in your inventory.

You will be able to edit the listing by clicking on this link:

https://catalog.amazon.com/abis/product/DisplayEditProduct?marketplaceID=ATVPDKIKX0DER&ref=xx_myiedit_cont_myifba&sku=MQ-X747-7080&asin=B00D3706T8&productType=SPORTING_GOODS#offer

It has been a pleasure serving you today. I wish you good health and success in all your future endeavors.

Have a wonderful day ahead!

Please let us know how we did.

Were you satisfied with the support provided?

Click here for yes:

https://sellercentral.amazon.com/hz/case-dashboard/hmd?p=A3T488MIZV725P&c=5146531571&k=hy

Click here for no:

https://sellercentral.amazon.com/hz/case-dashboard/hmd?p=A3T488MIZV725P&c=5146531571&k=hn

Thank you!

To view your case details, or respond, please click http://sellercentral.amazon.com/gp/case-dashboard/view-case.html/ref=sc_cd_lobby_vc?caseID=5146531571

Please note: this e-mail was sent from an address that cannot accept incoming e-mail. If you require additional support please contact us https://sellercentral.amazon.com/hz/contact-us

Your Current Notifications

You sold out of "Stakich Pure Yellow BEESWAX Block - 100% Natural, Craft Grade, Premium Quality - (1 lb)" in the last 30 days.

Help avoid missing potential sales by restocking this item.

Restock this ASIN (BOOF3CNMV4)

https://sellercentral.amazon.com/hz/productsearch?q=B00F3CNMV4&iris_notification_id=01875c9a40e8c73689139f08eff17081

Thank you for selling with Amazon,

Arun R

Amazon.com Seller Support

------Case 1:18-cv-00755-JTN-ESC ECF No. 34-2 filed 12/13/18 PageID.181 Page 5 of 14

MORE WAYS TO GET HELP:

Visit our Seller Forums for help from other sellers: http://sellercentral.amazon.com/forums

Browse all Seller Help topics: http://sellercentral.amazon.com/gp/help

To contact us again about this issue, please use the Contact Us form in Seller Central using the following link:

http://sellercentral.amazon.com/gp/contact-us/contact-amazon-form.html?caseID=5146531571

Please note: this e-mail was sent from a notification-only address that cannot accept incoming e-mail. Please do not reply to this message.

See less

david@dbec.us

Jun 06, 2018 12:39 PM

We have been buying this product for 20+ years

Attached are invoices from the company in which we buy our billiard cloth.

This claim came from another seller who is trying to avoid us in selling the same product so we can capitalize on the market.

We buy this billiard cloth in huge rolls and then on a daily basic cut pool table cloth off of it.

https://www.champbilliards.com/fabrics/

[http://www.champbilliards.com/wp-content/uploads/2013/03/rev-fabric-grid.gif]

Fabrics - Championship Billiards

www.champbilliards.com

David W. Bates
DB Entertainment Company
Soda Bar System
3700 East Elm Road
Oak Creek, Wisconsin 53154-6618
Phone: 414-255-4432

Fax: 414-762-2934 Email: david@dbec.us

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[1509468551755_Page_Game_Room.jpg]

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Please take a moment to view them all.

Main Site:

http://www.dbec.us

DBEC LLC

Billiard And Game Room:

http://www.dbentertainmentco.com

DB Entertainment Company

Beverage Dispensers:

http://www.sodabarsystem.com

Soda Bar System

Residential Beverage Dispensers:

http://www.sodabarsystems.com

Soda Bar Systems

[https://outlook.office.com/owa/service.svc

Case 1:18-cv-00755-JTN-ESC ECF No. 34-2 filed 12/13/18 PageID.182 Page 6 of 14

From: Amazon
Sent: Sunday, June 3, 2018 6:07 AM
To: DBEC LLC David W. Bates
Subject: Your Amazon.com Seller Account

[http://g-ecx.images-amazon.com/images/G/01/tmtdefaulttemplate/img/logo-selling_coach.png]

Hello.

We still need more information about the items at the end of this email. Please reply to this email with copies of invoices or receipts that include the following:

- -- Supplier information (name, phone number, address, website)
- -- Buyer information (name, phone number, address, website)
- -- Item descriptions (for ease of our review, you may highlight or circle the ASIN(s) under review)
- -- Item quantities
- -- Invoice date (must be issued in the last 365 days)

You can send .pdf, .jpg, .png, or .gif files. These documents must be authentic and unaltered. We may call your supplier to verify the documents. You may remove pricing information, but the rest of the document must be visible. We will maintain the confidentiality of your supplier contact information.

We will review your information and decide whether to reinstate your listings.

Have questions? Let us call you right away (https://sellercentral.amazon.com/hz/contact-us).

ASIN 1: B00D37O6T8

Title: 7' Tournament Green ProLine Classic 303 Billiard Pool Table Cloth Felt

Sincerely,

Seller Performance Team

https://www.amazon.com

[https://sellercentral.amazon.com/nms/img/c304bc16-670e-33fb-98e7-84797fda821a?sk=eOwK1l6n8B_Jt87404tJUNWLKP4P4bFVDmuOcf66lCVXchce5w-2OquF2_lLfsrDVVfjzycSY86DvH-g8CG_PA&n=1]

Attachments:

Championship, LLC_INV157758.pdf

Championship, LLC_INV158371.pdf Championship, LLC_INV158563.pdf

Championship, LLC_INV158980.pdf

See less

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Soda Bar Systems www.amazon.com

Storefront

Report listing abuse

Inventory Pricing Orders Advertising

Case ID 5032825631

Answered Case

Catalog

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Amazon

Please describe your issue.

May 23, 2018 10:39 AM

The Merchant on Amazon selling as Game Room Guys is repackaging products, with his red and white label, that he does not manufacture or have sole rights to in attempts to block other merchants from selling that product. I also carry some of these products and have a right to sell those products. We buy these products directly from the manufacturer D&R Industries and here is a link to their website. http://www.champbilliards.com/ D&R Industries and Championship are the manufacturer of these products and only sell to qualified merchants. Repackaging someone else's product, does not make it your product, again, Game Room Guys is not the manufacturer. Amazon clearly states in their contract merchants are not allowed to relabel products to block others. In fact, if you look at a list of Game Room Guy's products, every single item with the red and white label is a violation of Amazon's. We need to get this corrected ASAP, because he currently had Amazon block me from selling these products.

ASIN(s): ASIN: BOOACNUDES

Seller Name(s): Game Room Guys

Seller has provided a call-back number +14142554432 in the country United States. If Seller Support associates need additional information to resolve the case, the above number can be used to call the seller during business hours in the country\'s time zone.

Thank you for selling with Amazon,

Reethu P.

Amazon.com Seller Support

MORE WAYS TO GET HELP:

Visit our Seller Forums for help from other sellers: http://sellercentral.amazon.com/forums

Browse all Seller Help topics: http://sellercentral.amazon.com/gp/help

To contact us again about this issue, please use the Contact Us form in Seller Central using the following link:

http://sellercentral.amazon.com/gp/contact-us/contact-amazon-form.html?caseID=5032825631

Please note: this e-mail was sent from a notification-only address that cannot accept incoming e-mail. Please do not reply to this message. See less

david@dbec.us

Please describe your issue.

May 02, 2018 03:17 PM

The Merchant on Amazon selling as Game Room Guys is repackaging products, with his red and white label, that he does not manufacture or have sole rights to in attempts to block other merchants from selling that product. I also carry some of these products and have a right to sell those products. We buy these products directly from the manufacturer D&R Industries and here is a link to their website. http://www.champbilliards.com/ D&R Industries and Championship are the manufacturer of these products and only sell to qualified merchants. Repackaging someone else's product, does not make it your product, again, Game Room Guys is not the manufacturer. Amazon clearly states in their contract merchants are not allowed to relabel products to block others. In fact, if you look at a list of Game Room Guy's products, every single item with the red and white label is a violation of Amazon's. We need to get this corrected ASAP, because he currently had Amazon block me from selling these products.

ASIN(s): ASIN: BOOACNUDES

Seller Name(s): Game Room Guys

Seller has provided a call-back number +14142554432 in the country United States. If Seller Support associates need additional information to resolve the case, the above number can be used to call the seller during business hours in the country\'s time zone.

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Soda Bar Systems

www.amazon.com

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Report listing abuse

Case ID 5032804561

Answered Case View Your Case Log

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david@dbec.us

May 02, 2018 03:16 PM

Please describe your issue.

The Merchant on Amazon selling as Game Room Guys is repackaging products, with his red and white label, that he does not manufacture or have sole rights to in attempts to block other merchants from selling that product. I also carry some of these products and have a right to sell those products. We buy these products directly from the manufacturer D&R Industries and here is a link to their website. http://www.champbilliards.com/ D&R Industries and Championship are the manufacturer of these products and only sell to qualified merchants. Repackaging someone else's product, does not make it your product, again, Game Room Guys is not the manufacturer. Amazon clearly states in their contract merchants are not allowed to relabel products to block others. In fact, if you look at a list of Game Room Guy's products, every single item with the red and white label is a violation of Amazon's. We need to get this corrected ASAP, because he currently had Amazon block me from selling these products.

ASIN(s): ASIN: BOOACNUDES

Seller Name(s): Game Room Guys

Seller has provided a call-back number +14142554432 in the country United States. If Seller Support associates need additional information to resolve the case, the above number can be used to call the seller during business hours in the country\'s time zone.

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ASIN BOOACNUDES

Inventory

Case ID 5034011531

Catalog

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david@dbec.us May 02, 2018 05:32 PM

This email is to show that Game Room Guys is doing nothing more than taking products they don't manufacture and is putting their name on them to be the only seller.

https://www.amazon.com/Game-Room-Guys-Piece-Premium/dp/B00MOWIREI/ref=sr_1_11?s=leisure-sports-games&srs=3029053011&ie=UTF8& qid=1525305679&sr=1-11

The above is really Master Chalk which is manufacture by Tweeten, llok on the side of the chalk you can read Master.

http://www.tweeten.us/chalk.html

https://www.amazon.com/Set-Plastic-Bumper-Pool-Liners/dp/B004UBWFKI/ref=sr_1_13?s=leisure-sports-games&srs=3029053011&ie=UTF8&qid=1525305679& sr = 1 - 13

The above liners are manufacture by Championship

http://www.champbilliards.com/accessories/bumper-pool/

https://www.amazon.com/Bronze-Billiard-Bridge-Head-Table/dp/B00907YUKK/ref=sr_1_28?s=leisure-sports-games&srs=3029053011&ie=UTF8& qid=1525306277&sr=1-28

The above is manufacture by Championship

http://www.champbilliards.com/accessories/table-accessories/

 $https://www.amazon.com/Game-Room-Guys-Replacement-Bumper/dp/B00907TVXG/ref=sr_1_32?s=leisure-sports-games\&srs=3029053011\&ie=UTF8\&qid=1525306419\&sr=1-32$

The above is really manufacture by Championship

http://www.champbilliards.com/accessories/bumper-pool/

https://www.amazon.com/Pool-Table-Cushion-Facing-Billiards/dp/B00YFFAMKE/ref=sr_1_42?s=leisure-sports-games&srs=3029053011&ie=UTF8&gid=1525306502&sr=1-42

The above is really manufacture by Championship

http://www.champbilliards.com/cushion-rubber/

 $https://www.amazon.com/Replacement-Pads-Rapid-Cue-Sander/dp/B00YFF9F4S/ref=sr_1_44?s=leisure-sports-games\&srs=3029053011\&ie=UTF8\&id=1525306605\&sr=1-44$

These are really manufacture by Tweeten

http://www.tweeten.us/accessories.html

https://www.amazon.com/Moosehead-Billiard-Bridge-Head-Table/dp/B00YFFFLAU/ref=sr_1_91?s=leisure-sports-games&srs=3029053011&ie=UTF8&qid=1525306803&sr=1-91&refinements=p_89%3AGame+Room+Guys

This item is manufacture by Championship

http://www.champbilliards.com/accessories/table-accessories/

https://www.amazon.com/Chrome-Pool-Table-Billiard-Leveler/dp/B000WQ3CH0/ref=lp_3029053011_1_10?srs=3029053011&ie=UTF8&qid=1525307093&sr=8-10

This leg is manufacture by CASA pio 18 pv-00755-JTN-ESC ECF No. 34-2 filed 12/13/18 PageID.187 Page 11 of 14

http://www.champbilliards.com/accessories/table-repair/

https://www.amazon.com/Stern-Nascar-Pinball-Black-Rubber/dp/B004DR38PU/ref=sr_1_40?srs=3029053011&ie=UTF8&qid=1525307230&sr=8-40

These are manufacture by Sterns Pinball

http://www.sternpinball.com/

[https://outlook.office.com/owa/service.svc

/s/GetFileAttachment?id=AQMkADM4NjRlYjkxLTMzAGY0LTQyMTktOTNjNC0wODUwOTgxZjJmYjUARgAAA01VU4VjK09LkZyrVPhukeEHABFA3kpGk3JCuz6L7ElGEgsAAA %3D%3D&X-OWA-CANARY=w9jYsjnw50Kp-Yu0Qo5mjCCiSy8q1dQYVHXV9-qiaDajM38uUzfz9Thxne6dM0E597OnTJBQOtU.&isImagePreview=True]

From: Amazon Seller Support

Sent: Wednesday, May 2, 2018 5:51 PM

To: DBEC LLC David W. Bates

Subject: RE:[CASE 5034011531] ASIN BOOACNUDES

Greetings from Amazon Seller Support,

My name is Brenlee, the associate from the catalog department that is assigned to your case.

Once we got off the phone I was able to get in contact with the associate that was working with your ASIN and she provided an email alias that we could use to prove the other seller's trademark claim was invalid. To do this provide all manufacturer information and evidence you have. I've left the email alias below.

notice-dispute@amazon.com

If you would like to rate my service today, I have included a survey below. I greatly appreciate any feedback you are willing to provide.

I hope you have a wonder to Page 1 of 18 Try to 0755-JTN-ESC ECF No. 34-2 filed 12/13/18 PageID.188 Page 12 of 14
Please let us know how we did.
Were you satisfied with the support provided?
Yes No
Thank you!
To view your case details, or respond, please click http://sellercentral.amazon.com/gp/case-dashboard/view-case.html/ref=sc_cd_lobby_vc?caseID=5034011531
Please note: this e-mail was sent from an address that cannot accept incoming e-mail. If you require additional support please contact us https://sellercentral.amazon.com/hz/contact-us
Your Current Notifications
"Stakich Pure White BEESWAX Pellets - 100% Natural, Cosmetic Grade, Premium Quality - (1 lb)" is in high demand but currently has no offers. Consider expanding your offering of "Stakich" products by listing this item. Create an offer for this ASIN (B001LQZOLW).
https://catalog.amazon.com/abis/Display/ItemSelected?asin=B001LQZOLW&iris_notification_id=69f16cbf8935161d4f7b121050e9985a
Thank you for selling with Amazon,
Brenlee
Amazon.com Seller Support
MORE WAYS TO GET HELP:
Visit our Seller Forums for help from other sellers: http://sellercentral.amazon.com/forums
Browse all Seller Help topics: http://sellercentral.amazon.com/gp/help
To contact us again about this issue, please use the Contact Us form in Seller Central using the following link:

http://sellercentral.amazon.com/gp/contact-us/contact-amazon-form.html?caseID=5034011531

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[https://www.amazon.com/gp/r.html?C=Z8KB6HWUSXQA&M=urn:correios:msg:20180502225155a800aaccf0244783a99dfd343dc0p0na&R=9EEEO0VAP3DI&T=E&U=https%3A%2F%2Fimages-na.ssl-images-amazon.com%2Fimages%2FG%2F01%2Fnav%2Ftransp.gif&H=SORN9ECTA42FYWADJZKANQJUCJEA]
See less

Amazon

May 02, 2018 03:51 PM

Greetings from Amazon Seller Support,

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Amazon

May 02, 2018 03:00 PM

report a violation;

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Phone call: you and Amazon

May 02, 2018 02:48 PM

Amazon Seller Support notes about the conversation:

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Soda Bar Systems

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Pricing Orders Advertising Inventory Storefront Reports Performance Appstore B2B

Issue listing products | Listing not visible on Amazon | ASIN: B00ACNUDES

Case ID 5032630951

Answered Case View Your Case Log

Answered cases cannot be reopened after 5 days with no activity. If you need help with an issue, please contact us.

david@dbec.us

May 02, 2018 02:23 PM

Why was this listing removed from my account and not Game Room Guys. There is no trademark, it's beeswax. He didn't invent it, and it is not manufactured by him.

david@dbec.us

May 02, 2018 02:19 PM

Information from seller for ASIN: BOOACNUDES; SKU: KDF-AMC-6WK

Reason for case creation: Listing not visible on Amazon

Text from initial request:

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